

NOTE

Subject: EPA Comments on Kansas City Power & Light Co, LaCygne Generating Station,  
LaCygne, KS  
Round 7 Draft Assessment Report

To: File  
From: Jana Englander, OSWER, US EPA

Date: January 31, 2011

1. On p. 2, in the Introduction section, the report provides an assessment rating for the Upper and Lower AQC Ponds, but not the Bottom Ash Settling Pond. Since there are three ponds identified earlier, all three should be provided an assessment rating in this section.
2. On p.9, section 1.1.8, the report states that “to conclude that all of the ponds at the La Cygne Generating Station (*Upper and Lower AQC Ponds*) appear to be adequate for continued safe and reliable operation. All three of these ponds can be classified as follows:

POND NAME	HAZARD POTENTIAL
Lower AQC	<b>LOW</b>
Upper AQC	<b>LOW”</b>

The chart should include the hazard potential rating for the Bottom Ash Settling Pond as the document refers to “All three of these ponds can be classified as follows.” On p. 16, both the table and commentary rate the Bottom ash Settling Pond as Low hazard potential. Yet on p. 256, the Bottom Ash Settling Pond is rated “Less than Low.” Please rectify the discrepancy.

3. On p. 14, the report specifically states the time frame of construction for the Upper AQC, no statement is made at all for when the Lower AQC was constructed.
4. Pps.234-253, photos should be labeled to identify which pond one is seeing. Were there any photos of Bottom Ash Settling Pond taken and included in the report?

State: None

Company: See attached letter dated March 3, 2011



March 3, 2011

Mr. Stephen Hoffman  
US Environmental Protection Agency (5304P)  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

**Re: *Kansas City Power & Light Company – La Cygne Generating Station (Site 010)  
Bottom Ash Settling, Upper and Lower AQC Pond  
Dam Assessment Report***

Dear Mr. Hoffman:

Thank you for the opportunity to provide comments on the draft Dam Assessment Report for Kansas City Power & Light Company's (KCP&L) LaCygne Generating Station bottom ash settling and upper and lower AQC pond. The assessment was completed by Dewberry & Davis, LLC.

KCP&L has the following comments:

**Comment 1**

Section 1.1.1, Upper AQC Pond and Lower AQC Pond sections, revise "Ash" to "Air".

**Explanation**

This change would make the definition consistent with how used by KCP&L and as defined in other sections of the report.

**Comment 2**

Section 1.1.8, last sentence of first paragraph, references three ponds but only two are listed.

**Explanation**

This change would add the Bottom Ash Settling Pond to the list.

**Comment 3**

Table 2.1 should show the surface area of the Bottom Ash Settling Pond as 1.7 acres and the surface area of the Lower AQC Pond as 151 acres.

**Explanation**

This change would bring the assessment in line with Appendix A, Document 2, which was previously reported to the EPA Information Request on ponds and the portion of Steam Electric Questionnaire which was not included in the Appendix A.

**Comment 4**

Section 2.3, second paragraph, the second sentence, begin the sentence with "Sometime after ..."

**Explanation**

In 2004 a projection was made that the sale of ash products could be eliminated by the end of 2010. The regulatory decision has not been made so the sentence is more accurate with the addition of the word, "Sometime".

**Comment 5**

Table 2.3 should show the surface area of the Bottom Ash Settling Pond as 1.7 acres and the surface area of the Lower AQC Pond as 151 acres.

**Explanation**

This change would bring the assessment in line with Appendix A, Document 2, which was previously reported to the EPA Information Request on ponds and the portion of Steam Electric Questionnaire which was not included in the Appendix A.

**Comment 6**

Table 2.3 shows a superscript indicating a footnote, but no footnote is provided.

**Explanation**

Please consider including footnote for the portion of Steam Electric Questionnaire and include in the Appendix A.

**Comment 7**

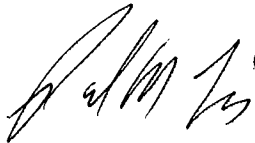
Figure 5.3.1-2 description text should be changed from "Upper" to "Lower" pond.

**Explanation**

This will correctly identify the picture.

Again, thank you for the chance to comment. If you have any questions please contact me at [paul.ling@kcpl.com](mailto:paul.ling@kcpl.com) or call 816-556-2899.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul M. Ling".

Paul M. Ling  
Manager of Environmental Services  
Kansas City Power & Light Company